

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BREM MOLDOVSKY, L.L.C., and	:	
BREM MOLDOVSKY, ESQUIRE,	:	Case No.
	:	2:21-cv-01365-ER
Plaintiffs,	:	
	:	
v.	:	
	:	
ANDREW ELLNER,	:	
LIGHTBOX VENTURES, LLC,	:	
and LIGHTBOX CAPITAL	:	
MANAGEMENT, LLC,	:	
	:	
Defendants.	:	

**DEFENDANTS' MOTION TO DISMISS, PURSUANT TO
FEDERAL RULES 12(b)(2) AND 12(b)(6)**

Defendants Andrew Ellner, Lightbox Ventures LLC, and Lightbox Capital Management, LLC (collectively, “Defendants”), by their undersigned attorneys, Haines & Associates, hereby move the Court to dismiss the Complaint of Plaintiffs, Brem Moldovsky, L.L.C. and Brem Moldovsky, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6). The arguments and authorities in support of Defendants’ Motion are stated at length in Defendants’ accompanying memorandum of law.

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WHEREFORE, Defendants respectfully request that the Court grant their Motion to Dismiss and enter an Order dismissing the Complaint in its entirety, with prejudice.

Respectfully submitted,

HAINES & ASSOCIATES

Dated: June 28, 2021

/s/ Clifford E. Haines

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